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May 26, 2023

Via ECF

The Honorable Katherine Polk Failla, U.S. District Judge
U.S. District Court, Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

Re: Letter Motion Requesting Extension of Time to file Settlement Agreement
Case: *Choinski v. Brown Meadow, Inc., et al.*
Case No.: 22-cv-01058 (KPF)

Dear Judge Failla,

This law firm represents Defendants, Brown Meadow, Inc., The Irreplaceable Artifacts Company Inc., and Evan Blum (collectively, the “Defendants”), in the above-referenced case. Having conferred with Plaintiff’s counsel, we respectfully write to jointly request an extension of time to file the completed settlement agreement along with a joint letter regarding the fairness of the settlement agreement, until on or about June 30, 2023, when Plaintiff’s counsel is due to return to his office and can complete the drafting of the referenced documents. The settlement agreement and fairness letter are currently due to be filed by today, May 26, 2023 [Dkt. Nos. 39].

We have conferred with Plaintiff’s counsel, Robert Wisniewski, Esq., who had agreed to file this letter but has experienced an issue with the filing, so we respectfully submit this joint request.

This application is the parties first request for an extension of time to file the completed settlement agreement and joint fairness letter. Accordingly, for the foregoing reasons, we respectfully request that the Court grant this application.

We thank the Court for its time and consideration.

Respectfully submitted,

FORCHELLI DEEGAN TERRANA LLP

By: /s/ Frank Brennan
Frank W. Brennan, Esq.

Cc: Plaintiff’s Counsel (via ECF)

Application GRANTED. The Clerk of Court is directed to terminate the pending motion at docket number 40.

Dated: May 30, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE